

Incommunities Group Limited

Modern Slavery and Human Trafficking Statement

1 Introduction from the Chief Executive

As a Registered Provider of social housing, we recognise our duty to combat modern slavery and human trafficking in all of its forms and we take steps to ensure it is not part of our business or our supply chains. This Modern Slavery and Human Trafficking Statement is an expression of our commitment to continuing to combat the tragic trade in human life.

Incommunities is committed to working with our partners and suppliers to combat modern slavery and human trafficking. We will combine support and assistance to tackle modern slavery and human trafficking with swift and proportionate enforcement action if it is identified in our organisation or any of our supply chains.

2 Organisational structure

Incommunities is one of the largest social housing providers in the UK. We provide affordable, high quality homes, principally for rent in neighbourhoods across the Bradford District, North, South and West Yorkshire regions.

We currently own over 21,000 homes for rent and have almost 1000 leasehold properties. We offer a range of housing options and services aimed at meeting the needs of our local communities and employ approximately 1000 people. Our vision is 'Improving Lives Incommunities'. We believe that everyone should have the opportunity to fulfil their potential and communities should be great places to live.

3 Our supply chains

The key areas which could be affected by slavery and human trafficking are: directly hired employees, agency workers and our suppliers' workforce.

We do the following to tackle modern slavery and human trafficking in our supply chains:

- Strive to identify parts of our supply chain where the risk of modern slavery is higher and then monitoring them.
- Protect whistle-blowers by applying the Incommunities Group Whistleblowing Policy so that reporting of suspected modern slavery incidents in our supply chain is encouraged.
- Provide training to staff who are involved with supply chains to help them to recognise the signs of modern slavery and know what to do if they suspect it, so that action can be taken.
- Place supply chain partners under contractual obligations to put similar antislavery measures in place.

4 Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. This policy is reviewed three yearly and updated to ensure it is relevant and up-to-date.

5 Training for Staff

Incommunities Group has many staff members who work in our neighbourhoods and who visit people's homes. They act as 'eyes and ears', so they are ideally placed for identifying the signs of modern slavery and have a safeguarding duty to report it.

In order to promote the reporting and tackling of modern slavery and human trafficking:

- We include modern slavery within our safeguarding training to enable staff to identify clues, and make staff aware of their duty to report known and suspected incidences of abuse.
- A collection of awareness raising materials is hosted on our Learning platform, Learn@Work, which are available for all staff. This includes videos and other resources from the Home Office, the Gangmasters and Labour Abuse Authority and Stronger Together.
- All Neighbourhood Officers, IHM staff, Trust Care Staff and Repairs Operatives are required to consider the 'Spot the Signs' and 'How to Report' information at <https://modernslavery.co.uk/spot-the-signs.html>
- On-going internal and external communications on spotting the signs and reporting modern slavery.

6. Measuring effectiveness

In April 2020, Incommunities established a Modern Day Slavery Steering Group to further support the Group's agenda and commitment towards addressing Modern Day Slavery issues. Collaborative meetings have taken place during the financial year to review relevant objectives and set KPI's. The Steering Group consists of a diverse range of staff from across the organisation to ensure all aspects of our business are considered.

7. Due diligence processes

In February 2021, Incommunities appointed a Head of Procurement to develop procurement as a function within the organisation. In addition, the Head of Procurement will also lead the Modern Day Slavery Steering Group. The Head of Procurement will ensure that the future Procurement Strategy

and purchasing procedures align with the organisations objectives of identifying and preventing Modern Day Slavery issues in the Supply Chain

8. Risk assessment

To enhance our approach to safeguarding, the company safeguarding procedure has been updated to include domestic abuse and modern day slavery. The decision was also taking by the working group to review the number of safeguarding managers with a view to increasing the number already identified.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. The law defines modern slavery as 'holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour.' It defines human trafficking as 'arranging or facilitating the travel of another person with a view to exploiting them'

This Statement constitutes Incommunities' Modern Slavery and Human Trafficking Statement for the financial year ending 31 March 2021 and was approved by the Board on 27 May 2021.



Rachael Dennis
Chief Executive
Incommunities Group Ltd



Jan Ormondroyd
Chair
Incommunities Group Ltd